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Hon. Valerie E. Caproni,  
United States District Judge  
United States Courthouse  
40 Foley Square  
New York, NY 10007-1312

July 10, 2014

Re: G31000 North America, Inc. et al v. Paris et al, 1:14-cv-03885-VEC

Dear Judge Caproni,

We represent G31000 North America, Inc, Allen Gluck and Alexis Dali (“Plaintiffs”) in the above-referenced case. We submit this joint letter prior to the initial scheduling conference, to comply with the Court’s June 19, 2014 order and the ECF order of yesterday (Docket No.11).

**Brief Description of the Case**

**Plaintiff’s Position:** Plaintiff brings this action for libel, defamation, trade libel, and interference with economic relations, based on *inter alia*, defendants’ clearly stated decision to damage plaintiffs through directly interfering with plaintiffs business relationships including through a combination of cyber bullying, publishing defamatory and libelous statements, threatening or seeking to have plaintiffs and plaintiffs business relationships’ employment terminated, and abusing or threatening individuals and businesses and that get in the way of defendants stated objective to Plaintiffs to “cost you money”. Plaintiffs seek injunctive relief and damages.

**Defendant’s Position:** Plaintiff alleges defendant published defamatory statements damaging personal and professional reputation all of which defendant denies.



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**Any Contemplated Motions:**

**Plaintiff's Position:** Plaintiff anticipates filing a motion for summary judgment and a motion for a temporary restraining order.

**Defendant's Position:** Motion to Dismiss is pending.

**The Basis For Subject Matter Jurisdiction:**

**Plaintiff's Position:** Diversity jurisdiction is proper as there is complete diversity and the amount in question is over \$75,000.

**Defendant's Position:** The court lacks subject matter jurisdiction for this matter. Plaintiffs fail to allege a federal question, federal law or federal rule of procedure that would properly invoke the jurisdiction of this Honorable Court, except to the extent the Declaratory Judgment Act is presumptively incorporated into Count IV, however, the plaintiffs do not seek declaratory relief in any of their purported causes of action.

**The Prospect of Settlement:**

**Plaintiff's Position:** The harm to Plaintiffs is ongoing and the case would benefit from expedited discovery so the parties can consider settlement options.

**Defendant's Position:** Doubtful.

Respectfully submitted

A handwritten signature in dark ink, appearing to read "R. Garson", with a stylized flourish at the end.

Robert Garson, Esq.

Cc: William Wohlsifer (ECF and email)